

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

LEGAL COUNSEL

Craig W. Albee, Federal Defender
Krista A. Halla-Valdes, First Assistant

Joseph A. Bugni, Madison Supervisor
John W. Campion
Shelley M. Fite
Anderson M. Gansner
Gabriela A. Leija
Peter R. Moyers
Ronnie V. Murray
Tom E. Phillip
Joshua D. Uller
Kelly A. Welsh

517 East Wisconsin
Suite 182
Milwaukee, Wisconsin 53202

Telephone 414-221-9900
Facsimile 414-221-9901

June 26, 2020

Honorable Pamela Pepper
US. District Judge
517 E. Wisconsin Avenue
Milwaukee, WI 53202

Re: *United States v. Yousef Barasneh*
Case No. 20-CR-26

Dear Judge Pepper:

I write again to appraise the Court of the status of this case. Assistant US Attorney Ben Proctor and I had an email exchange earlier this morning, and I believe I know where the government stands.

I informed Mr. Proctor that I intended to ask the Court to set a change-of plea hearing for a date in August, and that I would provide the government with a signed plea agreement a couple weeks in advance of that date. Mr. Proctor wants to get this case to resolution and would have liked to have the signed plea agreement forwarded to the government today, and if not today, then he'd like "very soon." He reminded me that there are victims in this case who are interested in what is going on with the case and that the case has bumped along for some time, now. In turn, I reminded him that, for reasons the government is fully aware of, Mr. Barasneh will not be taking this case to trial, that he will return a signed plea agreement, and the case will proceed to its conclusion. However, Mr. Barasneh and I continue to have things we want to accomplish before he enters a

FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.

Honorable Pamela Pepper
June 26, 2020
Page 2

plea. Mr. Proctor and I discussed the obligations each of has, some of which create a bit of tension in the process of arriving at agreed-upon dates.

With that background, it remains my position that the Court should set a change-of-plea hearing in August. I believe it is the government's desire to have the Court hold that hearing at an earlier date.

Mr. Barasneh understands that the Court will make another Speedy Trial Act finding in this case excluding the time between today and the next scheduled court appearance. Mr. Proctor and I thank the Court for its continued attention to this case.

Sincerely,

s/ John W. Champion
John W. Champion

JWC